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August 10, 2018

VIA ECF

The Honorable Magistrate Judge Arlene R. Lindsay
United States District Court – Eastern District of New York
Long Island Federal Courthouse
814 Federal Plaza
Central Islip, NY 11722-4451

Re: *Alex Goldman v. Catherine Reddington*,
Case No. 1:18-cv-03662-JFB-ARL

Dear Magistrate Judge Lindsay,

We have recently been retained to represent defendant Catherine Reddington (“Defendant” or “Ms. Reddington”) in the above-referenced action.

We write pursuant to Section 1(D) of Your Honor’s Individual Practices to respectfully request that Defendant’s time to answer or otherwise respond to the Complaint be extended from Monday, July 16, 2018 to Friday, August 24, 2018. This is the first such request made by counsel for Ms. Reddington, and Plaintiff consents to such extension.¹

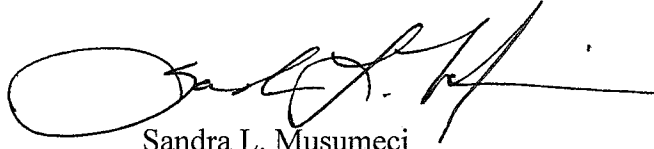
Additionally, in light of this firm’s new entrance into this matter and the requested extension of time to answer or otherwise respond to the Complaint, the Parties jointly request that the Initial Conference currently scheduled for Wednesday, August 15, 2018 at 1:30 p.m. (DE 19) be adjourned to Wednesday, September 12, 2018 (or another date on or after Monday, August 27, 2018). The reason for this requested adjournment is to permit new counsel for Defendant to become familiar with the issues of this case so that the Initial Conference may be a productive one. The parties have met and conferred regarding the Proposed Scheduling Order (DE 19-1) and have no objection to the dates and deadlines set forth therein. However, because this firm has been newly retained by Ms. Reddington and needs a reasonable amount of time to become familiar with the facts and issues of this case, we are not currently in a position to identify whether there are other issues that need to be addressed at an Initial Conference with the Court.

¹ On July 27, 2018, prior counsel for Ms. Reddington filed a Motion to Be Relieved as Counsel and sought a stay for 30 days for Defendant to retain new counsel. (DE 20). Plaintiff opposed the motion for a stay (DE 21), and on August 1, 2018, the Court ordered that Ms. Reddington obtain new counsel by August 10, 2018, which she has now done.

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We thank the Court for its consideration of these requests.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sandra L. Musumeci', with a large, stylized initial 'S' and a horizontal line extending to the right.

Sandra L. Musumeci
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